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9 CITIGROUP INC.; CITIBANK, N.A.

10 Additional Counsel Listed on Signature Block

11
12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

15 THE CHARLES SCHWAB
16 CORPORATION, et al.,

17 Plaintiffs,

18 v.

19 BANK OF AMERICA CORPORATION, et
20 al.,

21 Defendants.

Case No.: CV 13-2244-PJH

22 **STIPULATION AND PROPOSED**
23 **ORDER MODIFYING BRIEFING**
24 **SCHEDULE FOR PLAINTIFFS'**
25 **MOTION TO REMAND; AS MODIFIED**

26 Date: July 24, 2013
27 Time: 9:00 a.m.
28 Dept: Courtroom 3, 3rd Floor
Judge: Hon. Phyllis J. Hamilton

1 WHEREAS, on April 29, 2013, Plaintiffs commenced this action in the California State
2 Superior Court for the County of San Francisco;

3 WHEREAS, on May 16, 2013, Defendants removed this action to this Court;

4 WHEREAS, on June 17, 2013, Plaintiffs filed a Notice of Motion and Motion to
5 Remand the Action to California State Court (the "Remand Motion") with an accompanying
6 Memorandum of Points and Authorities;

7 WHEREAS, the Remand Motion was noticed for hearing on Wednesday, July 24, 2013
8 at 9:00 a.m., and Defendants' opposition is currently due on July 1, 2013; and

9 WHEREAS, this case includes multiple Defendants, and Defendants would like to
10 ensure that they have ample time to coordinate so they can submit a single opposition
11 memorandum.

12 THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court's approval,
13 as follows:

- 14 1. Defendants' opposition memorandum shall be filed on or before July 10, 2013.
- 15 2. Plaintiffs' reply memorandum shall be filed on or before July 17, 2013.
- 16 3. The current and requested deadlines are set forth below:

	<u>Current Deadline</u>	<u>Stipulated Deadline</u>
17 Defendants' Opposition Briefing:	July 1, 2013	July 10, 2013
18 Plaintiffs' Reply Briefing:	July 8, 2013	July 17, 2013

19 The hearing on the motion will proceed on July ³¹~~24~~, 2013 at 9:00 am, subject to any
20 change by the Court.

21 4. The deadline for Plaintiffs to amend their Complaint shall be 30 days after the
22 determination of Plaintiffs' Motion to Remand.

23 5. The deadline for Defendants to answer or otherwise respond to the Complaint
24 shall be extended until 60 days following the latest of (a) the determination of Plaintiffs' Motion
25 to Remand; (b) the date on which Plaintiffs' file an amended complaint or inform Defendants in
26 writing that they will not be filing an amended complaint; or (c) such other date as may be set
27 by an appropriate court.
28

1 IT IS SO STIPULATED.

2
3 DATED: June 28, 2013

4 By: /s/ Eric B. Fastiff
Eric B. Fastiff (Bar No. 182260)
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
5 Attorney for Plaintiffs
6

7 By: /s/ Tammy Albarrán
8 Tammy Albarrán (Bar No. 215605)
COVINGTON & BURLING LLP
9 Attorney for Defendants
10 CITIGROUP, INC.; CITIBANK, N.A.

11 By: /s/ Neal A. Potischman
12 Neal A. Potischman (Bar No. 254862)
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14 Tel: (650) 752-2000
15 Attorney for Defendants
BANK OF AMERICA CORPORATION; BANK OF
16 AMERICA, N.A.

17 By: /s/ Patrick E. King
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20 Tel: (650) 251-5000
21 Attorney for Defendants
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22 BANK, N.A.

23 By: /s/ David H. Stern
24 David H. Stern (Bar No. 196408)
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26 Tel: (213) 613-2800
27 Attorney for Defendant
28 PORTIGON AG (formerly known as WESTLB AG)

By: /s/ Michael Mugmon

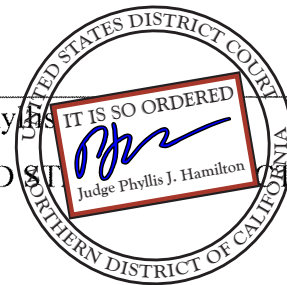
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Attorney for Defendant
THE ROYAL BANK OF SCOTLAND GROUP PLC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 2, 2013

Hon. Phyllis J. Hamilton
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
JUDGE



ECF CERTIFICATION

I, Tammy Albarrán, am the ECF User whose identification and password are being used to file this Stipulation And Proposed Order Modifying Hearing Date And Briefing Schedule For Plaintiff's Motion To Remand. In compliance with General Order 45.X.B, I hereby attest that Eric B. Fastiff, counsel for Plaintiffs; Neal A. Potischman, counsel for defendants Bank of America Corporation and Bank of America, N.A.; Patrick E. King, counsel for defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.; David H. Stern, counsel for defendant Portigon AG(formerly known as WestLB AG); and Michael Mugmon, counsel for defendant The Royal Bank of Scotlan PLC, have concurred in this filing.

DATED: June 28, 2013

COVINGTON & BURLING LLP

By: /s/ Tammy Albarrán
 Tammy Albarrán (Bar No. 215605)

Attorney for Defendants
 CITIGROUP, INC.; CITIBANK, N.A